

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

DALE LUDEMAN,

Plaintiff,

vs.

Case No. 07 C 50216

INDUSTRIAL MOLDS, INC. and  
TIM PETERSON

Defendants.

**MOTION FOR LEAVE TO FILE AFFIRMATIVE DEFENSES**

The Defendant, Tim Peterson, by his attorneys, McGreevy Williams, P.C. states as follows for his Motion for Leave to File Affirmative Defenses to Tortious Interference Claim:

1. Tim Peterson attaches his proposed Affirmative Defenses to this motion.

WHEREFORE, Tim Peterson requests leave to file his Affirmative Defenses, along with an award of such other relief as the Court deems just.

INDUSTRIAL MOLDS, INC., and  
TIM PETERSON, Defendants

BY: MCGREEVY WILLIAMS P.C.

BY: /s/ Donald Q. Manning  
Donald Q. Manning

Donald Q. Manning  
McGreevy Williams, P.C.  
6735 Vistagreen Way  
P.O. Box 2903  
Rockford, IL 61132-2903  
815-639-3700  
fax: 815-639-9400

STATE OF ILLINOIS                 )  
  ) SS.  
COUNTY OF WINNEBAGO         )

**AFFIDAVIT OF SERVICE**

I, the undersigned, being first duly sworn on oath, depose and say that I served the Motion for Leave to File Affirmative Defenses upon the within named:

Amy L. Lindner  
Reinhart Boerner Van Deuren, s.c.  
1000 North Water Street  
Suite 2100  
Milwaukee, WI 53202

John H. Zawadsky  
Christopher P. Banaszak, Esq.  
Christopher W. Rawsthorne, Esq.  
Reinhart Boerner Van Deuren s.c.  
1000 North Water Street  
Suite 2100  
Milwaukee, WI 53202

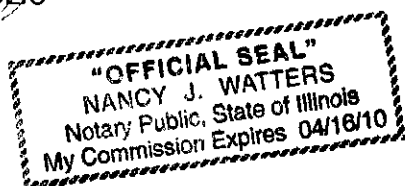
Katie D. Triska  
Reinhart Boerner Van Deuren, P.C.  
1000 North Water Street  
Milwaukee, WI 53202

by electronically filing said documents with the Clerk of the Federal Court using the CM/ECF filing system, at or about the hour of 11:00 o'clock A.M., on the 3<sup>rd</sup> day of September, 2008.

*Sheri Ann Meoni*

Subscribed and sworn to before  
me this 3<sup>rd</sup> day of September, 2008.

*Nancy J. Watters*  
NOTARY PUBLIC



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

DALE LUDEMAN,

Plaintiff,

vs.

Case No. 07 C 50216

INDUSTRIAL MOLDS, INC. and  
TIM PETERSON

Defendants.

**DEFENDANT, TIM PETERSON'S AFFIRMATIVE DEFENSE  
TO TORTIOUS INTERFERENCE CLAIM**

The Defendant, Tim Peterson, by his attorneys, McGreevy Williams P.C., states as follows for his Affirmative Defense to Tortious Interference Claim :

1. Tim Peterson's conduct in connection with and surrounding the termination of the Plaintiff, Dale Ludeman, was qualified, privileged and protected under Illinois law.
2. The conduct of Tim Peterson in connection with and surrounding the employment and termination of Dale Ludeman was performed for and on behalf of the corporate defendant, and, as a result, Tim Peterson cannot be separately liable under the facts and circumstances as alleged.

WHEREFORE, Industrial Molds, Inc. and Tim Peterson request judgment in its favor and against the Plaintiff and for an award of its fees, costs and such other relief as the Court deems just and proper.

INDUSTRIAL MOLDS, INC., and  
TIM PETERSON, Defendants

BY: MCGREEVY WILLIAMS P.C.

BY: /s/ Donald Q. Manning  
Donald Q. Manning

Donald Q. Manning  
McGreevy Williams, P.C.  
6735 Vistagreen Way  
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STATE OF ILLINOIS                    )  
  ) SS.  
COUNTY OF WINNEBAGO        )

**AFFIDAVIT OF SERVICE**

I, the undersigned, being first duly sworn on oath, depose and say that I served the Defendant, Tim Peterson's, Affirmative Defenses to Tortious Interference Claim upon the within named:

Amy L. Lindner  
Reinhart Boerner Van Deuren, s.c.  
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Milwaukee, WI 53202

by electronically filing said documents with the Clerk of the Federal Court using the CM/ECF filing system, at or about the hour of \_\_\_\_\_ o'clock P.M., on the \_\_\_\_\_ day of September, 2008.

\_\_\_\_\_

Subscribed and sworn to before  
me this \_\_\_\_\_ day of September, 2008.

\_\_\_\_\_  
NOTARY PUBLIC